

**From:** [David Dickinson](#)  
**To:** [Khesha Jennings](#); [Linc Wehrly](#)  
**Subject:** Fw: Mercedes Bluetec Technology  
**Date:** 04/05/2006 11:52 AM

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----- Forwarded by David Dickinson/DC/USEPA/US on 04/05/2006 11:43 AM -----

**David  
Dickinson/DC/USEPA/US**

To [Linc Wehrly/AA/USEPA/US](#)

cc

03/03/2006 05:41 PM

Subject Fw: Mercedes Bluetec Technology

Linc -

I have had recent experience on the (b)(7) adjustments - both for an individual manufacturer and for the whole industry. Give me a call if you want or keep me in mind if and when you need to put a FR notice together.

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----- Forwarded by David Dickinson/DC/USEPA/US on 03/03/2006 05:40 PM -----

**Khesha  
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To [dickinson.david@epamail.epa.gov](mailto:dickinson.david@epamail.epa.gov)@EPA

cc

03/03/2006 05:37 PM

Subject Re: Fw: Mercedes Bluetec Technology 

Good idea.

▼ [David Dickinson/DC/USEPA/US](#)

**David  
Dickinson/DC/USEPA/US**

To [Khesha Jennings/DC/USEPA/US@EPA](#)

cc [Clifford Dean/DC/USEPA/US@EPA](#)

03/03/2006 05:32 PM

Subject Re: Fw: Mercedes Bluetec Technology 

I think you are right about the FR Notice that would be needed - should I let Linc know that I can help him out with that?

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▼ Khesha Jennings/DC/USEPA/US

**Khesha  
Jennings/DC/USEPA/US**

To Clifford Dean/DC/USEPA/US@EPA,  
dickinson.david@epamail.epa.gov@EPA

03/03/2006 05:16 PM

cc

Subject Fw: Mercedes Bluetec Technology

FYI

Cliff - can you think of anything that Emily or Linc missed?  
David - it looks like they may eventually need a FR notice like you just prepared.

Khesha

----- Forwarded by Khesha Jennings/DC/USEPA/US on 03/03/2006 05:13 PM -----

**Linc  
Wehrly/AA/USEPA/US**

To Karl Simon/DC/USEPA/US@EPA  
Dan Harrison/AA/USEPA/US@EPA, Emily  
Chen/AA/USEPA/US@EPA, Janet  
Cohen/AA/USEPA/US@EPA, Khesha  
cc Jennings/DC/USEPA/US@EPA, Martin  
Reineman/AA/USEPA/US@EPA, Stephen  
Healy/AA/USEPA/US@EPA

03/03/2006 03:26 PM

Subject Re: Mercedes Bluetec Technology 

Let me think about that one.


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▼ Karl Simon/DC/USEPA/US

**Karl  
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EPA-OAR,OTAQ,CISD

Received Date:  
03/03/2006 03:16 PM  
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To Linc Wehrly/AA/USEPA/US@EPA  
cc Dan Harrison/AA/USEPA/US@EPA, Emily  
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Cohen/AA/USEPA/US@EPA, Khesha  
Jennings/DC/USEPA/US@EPA, Martin  
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Subject Re: Mercedes Bluetec Technology 

I think this suite of issues covers the ones I am concerned about so far. One question - what rationale do we have for  miles? thanks

▼ Linc Wehrly/AA/USEPA/US

**Linc  
Wehrly/AA/USEPA/US**

03/03/2006 03:09 PM

To Emily Chen/AA/USEPA/US@EPA  
Dan Harrison/AA/USEPA/US@EPA, Janet  
Cohen/AA/USEPA/US@EPA, Karl  
cc Simon/DC/USEPA/US@EPA, Khesha  
Jennings/DC/USEPA/US@EPA, Martin  
Reineman/AA/USEPA/US@EPA, Stephen  
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Subject Re: Mercedes Bluetec Technology 

Thanks, Emily.

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Received Date:  
03/03/2006 02:59 PM  
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03/03/2006 02:59:25 PM

To Linc Wehrly/AA/USEPA/US@EPA  
cc Dan Harrison/AA/USEPA/US@EPA, Janet  
Cohen/AA/USEPA/US@EPA, Karl  
Simon/DC/USEPA/US@EPA, Khesha  
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Subject Re: Mercedes Bluetec Technology 

I have two more concerns:

1. Readiness and coverage of urea distribution infrastructure.
2. Low temp (ice point) impacts and prevention measurements, if necessary.

Emily

▼ Linc Wehrly/AA/USEPA/US

**Linc  
Wehrly/AA/USEPA/US**

EPA-OAR,OTAQ,CISD

Sent by: Linc Wehrly

Received Date:

03/02/2006 04:29 PM

Transmission Date:

03/02/2006 04:29:22 PM

To Karl Simon/DC/USEPA/US@EPA

cc Dan Harrison/AA/USEPA/US@EPA, Janet  
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Chen/AA/USEPA/US@EPA, Martin  
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Subject Mercedes Bluetec Technology

Karl,

I wanted to confirm our thoughts on the Mercedes Bluetec (SCR) technology so that when Simon Godwin comes to meet with us in Ann Arbor in late March or early April we know what we want to discuss.

### Questions

- How does Mercedes plan to ensure that only urea is placed in the urea tank?
- What is the durability of the urea dosing valve and associated hardware?
- What is the durability of the entire SCR system - urea tank, dosing valve and lines, SCR catalyst, chimes, bells, lights, etc..?
- How does Mercedes plan to ensure that the 2nd, 3rd, and 4th owners of vehicles will operate vehicles with urea? How will they know how system works, where to get urea, where to put urea, etc..?

### Requirements

- We would like Mercedes to extend the distance at which the starts begins before no restart from CBI / Ex. 4 miles. CBI / Ex. 4

### Regulatory Issues

- There are two regulatory issues with respect to allowing SCR systems - minimum maintenance intervals and adjustable parameters.

- **Minimum maintenance intervals:** the minimum maintenance interval for diesel LDVs/LDTs is 100,000 miles. Clearly urea would have to be replenished sooner than 100,000 miles, thus we would have to get into a "(b)(7)" process to allow manufacturers to perform maintenance to the catalyst (refill urea) at an interval less than 100,000 miles. Hopefully, we could do this as one single approval that would be applicable to all manufacturers instead of separately for each manufacturer.
- **Adjustable parameters:** the use of urea would be considered an adjustable parameter. We have the authority to test a vehicle at the full range of adjustable parameters, meaning we could test the vehicle without urea. We need to discuss with OGC.

Please let me know if there are any other questions, concerns, or thoughts.

Linc

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